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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re: NEW JERSEY MOTORSPORTS PARK, LLC, Debtor	Chapter 11 Case No.
In re: NEW JERSEY MOTORSPORTS PARK OPERATING COMPANY, LLC, Debtor	Chapter 11 Case No.
In re: NEW JERSEY MOTORSPORTS PARK URBAN RENEWAL, LLC, Debtor	Chapter 11 Case No.
In re: NEW JERSEY MOTORSPORTS PARK DEVELOPMENT ASSOCIATES, LLC, Debtor	Chapter 11 Case No.

**DEBTORS' APPLICATION FOR DESIGNATION AS
COMPLEX CHAPTER 11 CASES**

These four (4) above-captioned bankruptcy cases were filed on March 7, 2011. The undersigned party in interest believes that these cases qualify under the Court's General Order Authorizing Procedures For Complex Chapter 11 Cases, dated November 25, 2009, as complex Chapter 11 cases because:

- _____ The Debtors have total liabilities of more than \$ 40 million;
- _____ The Debtors have total assets of more than \$ 30 million;
- _____ There are more than 150 creditors in these cases;
- _____ Claims against the Debtors are publicly traded;
- X Other: Substantial explanation is required. (Attach additional sheets if necessary.)

The debtors' ongoing business concerns include the operation of a motorsports racetrack, restaurant, concessions, retail sales, and hotel room sales. The debtors anticipate consummating a complex business transaction during the pendency of their bankruptcy cases (to wit, the auction of ownership interests in the reorganized debtor). The debtors submit that complex case designation will assist in their continuing to do business with various vendors and keeping open to the public, while taking steps to hold an auction sale and consummate the transaction.

**COHEN, SEGLIAS, PALLAS, GREENHALL
& FURMAN, P.C.**

By: /s/ Nella M. Bloom

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Proposed Attorney for the Debtors

Dated: March 7, 2011